| Agenda Items | Discussion |
|---|---|
|  | Bernadette questioned what the cause of the delay is. Jill replied that the high rate of defects and the time in which BellSouth has to identify and correct the defects will not allow **us** to implement the release on December 8. Additionally, this release is more complex, specifically with the UNE-to-UNE Bulk order feature. There is **no** industry standard for this feature nor has it been implemented by any other ILEC. Bernadette requested that BST provide additional information as to the cause of the delay. BST agreed to provide additional information. |
| **3. Release 11.0 - Options 1 & 2** | Jill presented the two options for Release 11.0: <br><br> Option 1: <br><br> • 12/29/02 Implementation Date <br><br> • 11/25/02 - 12/27/02 CAVE <br><br> • UNE to UNE Bulk Migrations would be deferred <br><br> • 1/19/02 - Release 11.1 (defects and XML via Internet) <br><br> • 3/30/03 - Release 12.0 (add UNE to UNE Bulk Migrahons) <br><br> • Releases 12.0, 13.0 and 14.0 keep current schedule and scope <br><br> Option 2: <br><br> • 1/19/03 Implementation Date - Releases 11.0 and 11.1 combined (keeps content of Release 11.0 whole and includes Internet option for XML) <br><br> • 12/9/02 - 1/17/03 CAVE <br><br> • Releases 12.0, 13.0 and 14.0 keep current schedule and scope <br><br> CLECs questioned what confidence BST has that the unplementation dates for the two options will not change. Jill replied that BST has confidence that the unplementation dates in the two options will be net based on the steps BST is taking and the rate for clearing defects. <br><br> Sherry questioned what is the acceptable number of defects that BST would go into CAVE with for a release. Jill replied that no seventy 1 or 2s would go into CAVE. <br><br> Tami Swenson (Accenture) queshoned that if Option 1 is chosen, would resources be available to test during the Holiday season. Jill replied that resources will be available to do CAVE testing with CLECs if Option I is selected. |

| Agenda Items | Discussion |
|---|---|
| | Sherry questioned if there would be an overlap in testing between Releases 11.0 and 12.0 with Option 2. Jill replied that Option 2 would cut the post-soak window short, but not the pre-soak **wmdow.** |
| | Sherry asked Jill what option she would select if she was in a CLEC position. Jill replied that it's up to each CLEC's individual needs. From a personal perspective, she would select Option 2 because it includes all of Release 11.0 content. |
| | Sherry questioned what additional internal checkpoints BST would make. Jill advised that more frequent checks are being made at the officer level within BST and with our vendors. Sherry commented that the CLECs need to understand the root cause to ensure the problem is bring addressed. Colette questioned d officers were already aware of these issues. Jill replied that the officers are aware of every release and intervene, if necessary. Kyle questioned if the officers are involved because of 271 and requested that this be added to the CCP guide. Jill replied that our officers have always been kept apprised of the releases and are involved as much as necessary. The internal involvement **of** personnel is an internal process and shouldn't be documented in the CCP guide. |
| | Jill commented that BST will have a checkpoint with the CLECs every two weeks. |
| | Bernadette requested that BST provide capacity per system. Jill stated that this information is not available at the point of priorihzation and that, as stated on previous occasions; it is not a fixed number. The capacity vanes by apphcation and by phase for each release. |
| | Dee Freeman Butler (BST) recommended Option 2 because it offers a fewer number of releases in **2003.** |
| **3. CLEC Feedback** | After the CLEC meeting, Sherry presented the following: |
| | CLECs agree to BellSouth's option 1 with condihons. They requested that BellSouth provide the following information on a twice a week basis: |
| | 1. Status on Mondays and Thursdays |
| | 2. Complete listing of the number of seventy 1 and severity 2 defects and the process being used to close them |
| | 3. Plan to meet the due date |
| | 4. Final go/no go on 11/18/02 |
| | In addition, CLECs want a complete escalation of what BellSouth is doing to ensure that these problems do not continue on an on-going basis, a firm commitment to fix defects found in this release, and an explanation of what actually caused these problems (resources, programmer problems, poor specifications, etc.) |

| Agenda Items | Discussion |
|---|---|
| **4. BST Response to CLEC Feedback** | Jill indicated that BST tan support the checkpomts and will investigate how much detail can be provided. BST committed to provide a response to the CLECs by close of business on 11/5/02. The response regarding root cause information will be provided at a later date. |
| **5. Summary of New Action Items** | |

NEW ACTION ITEM: BellSouth to provide a response to the CLEC community by COB on 11/5/02 regarding the CLEC feedback & additional points for Option 1-Release 11.0.

ATTACHMENT  3

From:      **Change.Control@bridge.bellsouth.com**
Sent:      Thursday. October 31, 2002 2:21 PM
To:

alee@epicus.com; alejandro@amexcomm.com; amanda.hill@wcom.com;
Annette.Cook@espire.net; Annette.Hardy@accesscomm.com; Lynn.Arlhur@BellSouth.com,
avincent@communitytelephone.com; bbil@4pra.com; bcanas@nightfire.com;
Becky.Gorman@accesscomm.com; bellsouth@nightfire.com;
beverly.lockwood@btitele.com; beverly.posey@centurytel.com; Bill.York@wcom.com;
billg@telcordia.com; bmurdo@KMCTELECOM.com;
Bob.Buerrosse@allegiancetelecom.com; Bradbury,Jay M - LGA;
Brenda.Gant@KMCTELECOM.com; brian.feller@btitele.com; Seigler,Bernadette M (Bern) -
NCAM: bshafer@covad.com; BSNotes@talk.com; BSTCarrier@birch.com;
bstewart@biztelone.com; c-david.burley@wcom.com; c-Lorraine.Watson@wcom.com;
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CAshford@birch.com; cassandrap@networktelephone.net; Catherine.Gray@alltel.com;
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- ALINF: Cedric.Cox@wcom.com; cflanigan@uslec.com; Chad.Pifer@xspedius.com;
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cheryl_acosta@stratosoilandgas.com; clarson@dset.com; cmiller@telepak.net;
CoDavis@covad.com; colleen.e.sponseller@wcom.com;
**Connie.Nathan@KMCTELECOM.com; craig.davis@centurytel.com;**
cschneider@concretio.com; csmallwood@city.marietta.ga.us; CSoptic@birch.com;
cstevens@mpowercom.com; daddymax@netbci.com; daisy.ling@wcom.com;
darrin.mcclary@centurytel.com; Kevin.Davis2@BellSouth.com; DCooley@nuvox.com;
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DNapovanice@birch.com; dnathanson@natelcomm.com; don@amexcomm.com;
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dwilliams@nowcommunications.com; Elliot.Wrann@dsl.net; epadfield@nextlink.com;
ESingleton@eztalktelephone.com; eyu@talk.com; Alan.Flanigan@twtelecom.com;
fouts@communitytelephone.com; frankb@cellone-ms.com; Fred.Brigham@wcom.com;
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Lianne.Griffin@BellSouth.com; hcarlton@sevenbridges.net; Heather.Thompson2
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Timmons,King C (K.C.) " NCAM; Kyle.Kopytchak@networktelephone.net; launch-
now.notify@accenture.com; launch-now.notify@cscoe.accenture.com;
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Subject: ID: BST/CLEC Conference Call Meeting to discuss Release 11.0


CLECs,

BellSouth would like to hold a conference call meeting with the CLECs on Monday, November 4 at 3:00 pm EST, to discuss the status of Encore Release 11.0, scheduled for implementation on 12/07-08/2002.

Additional information for this meeting is forthcoming.

The conference bridge will be 205-968-9300, Access Code: 116589.

If you have any questions, please advise.

Thanks,

Change Management Team

————————————————— Distributed Message —————————————————

Message sent by:  Change Control /m6,mail6a

ATTACHMENT  4

> From:     Change.Control@bridge.bellsouth.com [mailto:Change.Control@bridge.bellsouth.com]
> Sent:     Friday, November 01, 2002 10:16 AM
> To:  alee@epicus.com; alejandro@amexcomm.com; arnanda.hill@wcom.com;
Annette.Cook@espire.net; Annette.Hardy@accesscomm.com; Lynn.Arthur@BellSouth.com;
avincent@communitytelephone.com; bbil@4pra.com; bcarias@nightfire.com;
Becky.Gorman@accesscomm.com; bellsouth@nightfire.com; beverly.lockwood@btitele.com;
beverly.posey@centurytel.com; Bill.York@wcom.com; billg@telcordia.com;
bmurdo@KMCTELECOM.com; Bob.Buerrosse@allegiancetelecom.com; Bradbury,Jay M - LGA;
Brenda.Gant@KMCTELECOM.com; brian.feller@btitele.com; Seigler,Bernadette M-(Bern) - NCAM;
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donna.poe@knology.com; dpetry@ix.netcom.com; dwilliams@nowcommunications.com;
Elliot.Wrann@dsl.net; epadfield@nextlink.com; ESingleton@eztalktelephone.com; eyu@talk.com;
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1

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> Subject:    ID: 11/04/02 Release 11.0 Conference Call - Meeting Handouts
>
> >  <<SEND>> > >  <<R11RELEA.PPT>> > >  <<U2UMANUA.PPT>>

CLECs,

The attached material will be used in our discussion on the status of Release 11.0 on Monday, November 4 at 3:00 PM **EST. As** we've progressed through our testing cycle, we've determined that the number of defects in the software is larger than it should be at this point in the schedule. Given this, BellSouth does not believe a December 8 implementation date can be met with acceptable quality.

BellSouth has developed two (2) alternatives to mitigate the impacts and will walk-through these options on Monday. We will walk through the attached scenarios in the meeting and will need to gain consensus from the CLEC community at the end of the meeting on the preferred option to move forward with. We look forward to discussing these with you on Monday.

If you have any questions, please advise

Thanks

Change Management Team

_____ Distributed Message _____

Message sent by: Change Control /m6,mail6a

To unsubscribe from CCP. send a message to
list.manager.@bridge.bellsouth.com  with the Subject line: UNSUBSCRIBE CCP

For online help, send a message with the subject  HELP.

# Option 1

| NOV | DEC | JAN | FEB | MAR | APR | MAY | JUN |
|-----|-----|-----|-----|-----|-----|-----|-----|

**R11.0**
**CAVE**
11/29 - 12/27/02

12/29/02

**R11.1**
1/19/03

**R12.0**
**CAVE**
1/27 - 3/28/03

3/30/03

**R13.0**
**CAVE**
4/21 - 6/20/03

6/22/03
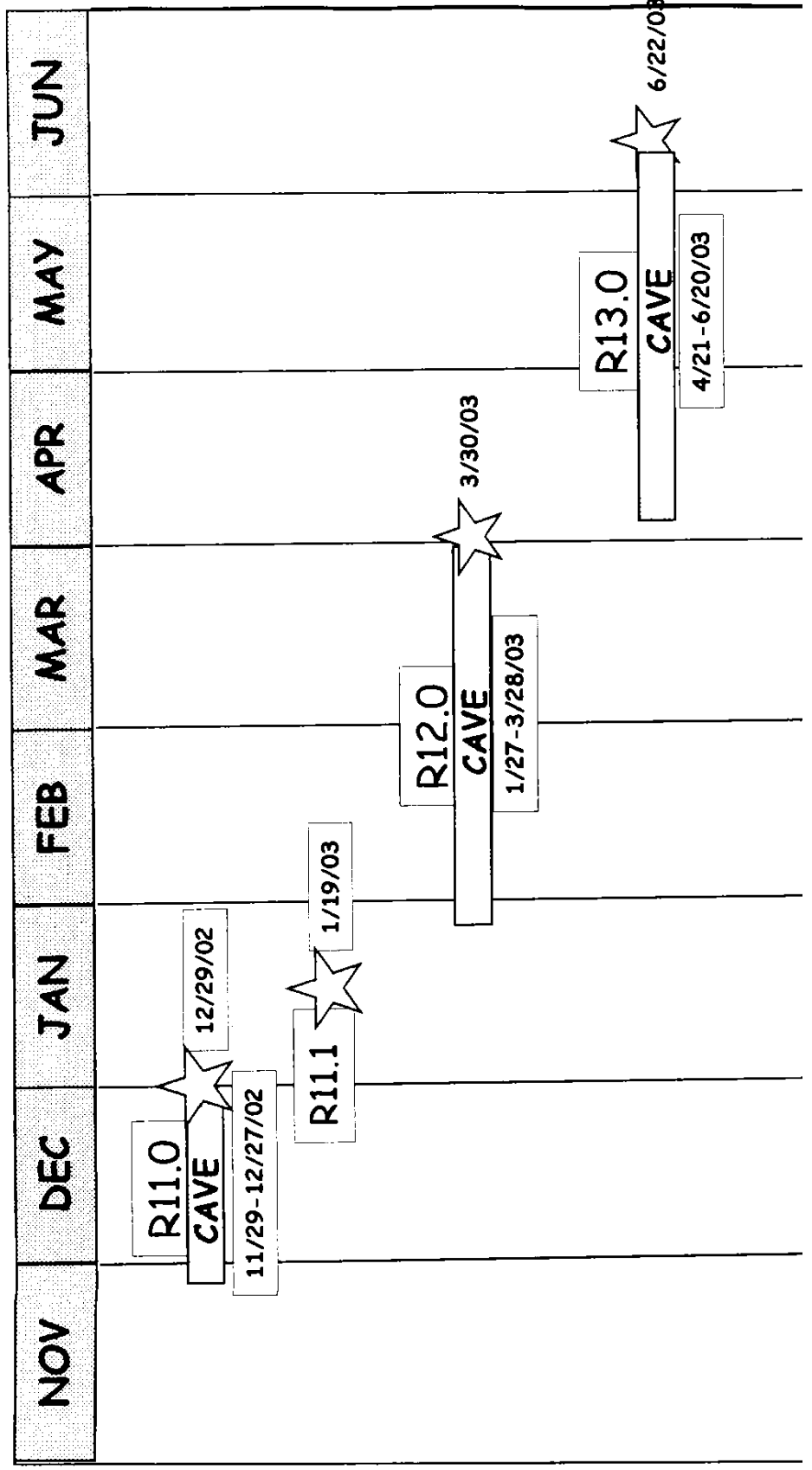
NOTE: CAVE windows represent pre-soak only.

# Option 1 Summary

- **Defer implementation** of **Release** 11.0 to **December** *29;* CAVE **testing** to **begin December** 2.

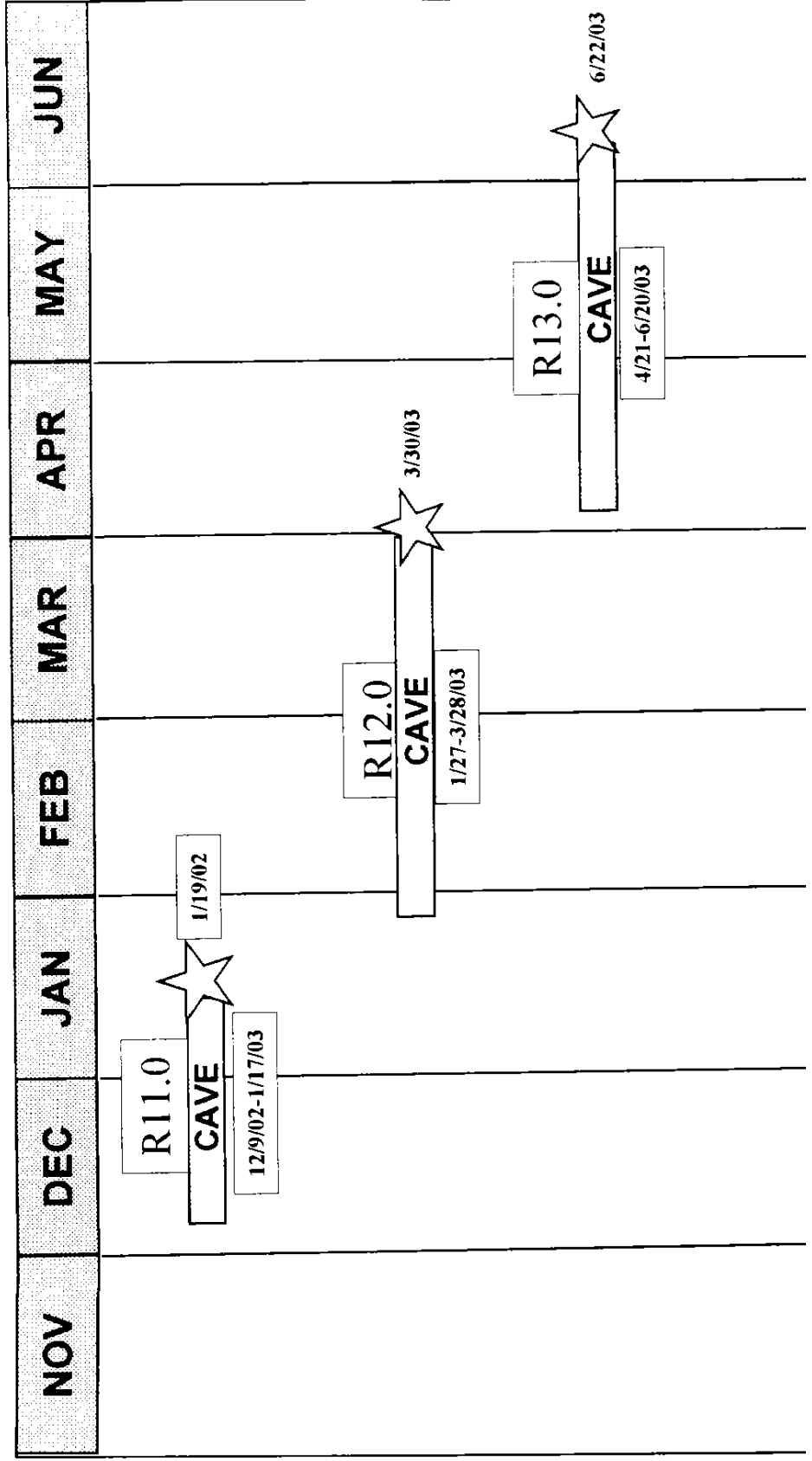- **Defer delivery** of UNE-P to UNE-L **feature** from **scope** of 11.0.

- **Implement** UNE-P to UNE-L **feature with Release** 12.0 **on March** 30, 2003. CAVE **testing** to **begin on January** 27, 2003.

- **Benefits:**
    - **Improves chance** of **successful implementation** of **Release** 11.0.
        - Reduces scope of testing and pre-production defect correction.
        - Focuses resources on remainder of release

- CLEC **Impact:**
    - **Requires** two **releases** for **full functionality**
    - **3 week delay in majority** of **release and** 15 **week delay** in UNE-P to UNE-L **feature**

# Option 2

| NOV | DEC | JAN | FEB | MAR | APR | MAY | JUN |
|-----|-----|-----|-----|-----|-----|-----|-----|

**R11.0**
**CAVE**
12/9/02–1/17/03
⭐ 1/19/02

**R12.0**
**CAVE**
1/27–3/28/03
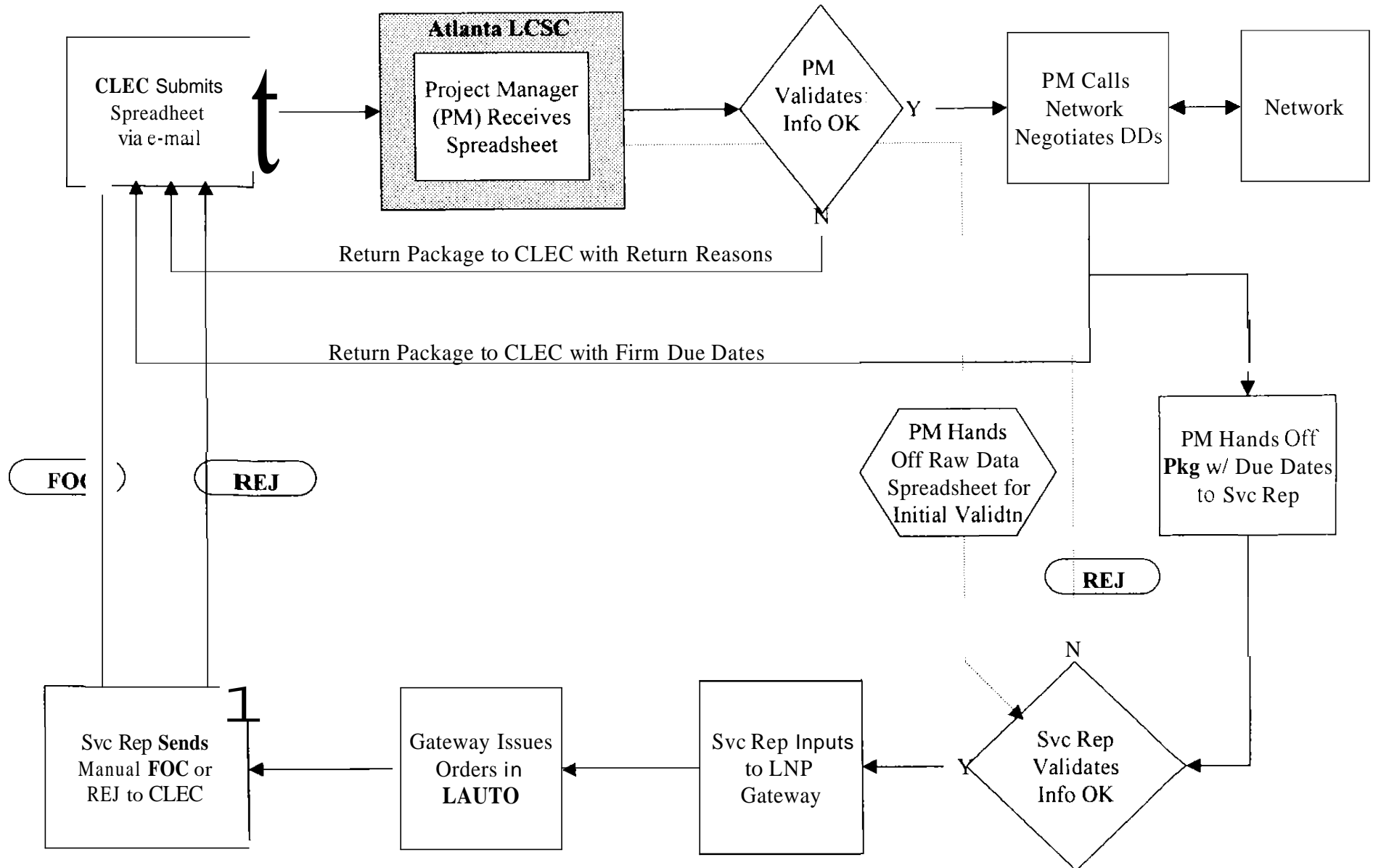⭐ 3/30/03

**R13.0**
**CAVE**
4/21–6/20/03
⭐ 6/22/03

NOTE: CAVE windows represent pre-soak only.

3

# Option 2 Summary

- **Defer implementation** of **Release 11.0** until the maintenance release scheduled for January 19, 2003. CAVE testing to begin December 9, 2002.

- **Includes all features, including** UNE-P to UNE-L **and** XML for **internet users.**

- **Benefits:**
  - All Release 11.0 planned features, including full UNE-P to UNE-L functionality, will be installed together.
  - Combining of 11.0 with the maintenance release results in less releases to manage.
  - Improves chance of successful implementation of Release 11.0.

- CLEC impact:
  - Six week delay in implementation of full feature set

# UNE-to-UNE Bulk (U2U)– Interim Manual Procedures

**Atlanta LCSC**

CLEC Submits Spreadheet via e-mail

→

Project Manager (PM) Receives Spreadsheet

→

PM Validates Info OK — Y →

PM Calls Network Negotiates DDs

↔

Network

N

Return Package to CLEC with Return Reasons

Return Package to CLEC with Firm Due Dates

PM Hands Off Raw Data Spreadsheet for Initial Validtn

PM Hands Off **Pkg** w/ Due Dates to Svc Rep

( FOC )   ( REJ )

REJ

N

Svc Rep **Sends** Manual **FOC** or REJ to CLEC

←

Gateway Issues Orders in **LAUTO**

←

Svc Rep Inputs to LNP Gateway

← Y —

Svc Rep Validates Info OK

ATTACHMENT 5

BellSouth Interconnection Services
675 West Peachtree Street
Atlanta, Georgia 30375

Carrier Notification
**SN91083420**

Date:       November 8.2002

To:         Competitive Local Exchange Carriers (CLECs)

Subject:    CLECs – BellSouth Unbundled Network Element-Platform (UNE-P) UNE-P- to-
            UNE-L (Loop and number portability) **Bulk** Migration – Trial Offering for Manual
            Process

This serves as notification of a trial offering for the UNE-P-to-UNE-L Bulk Migration manual
process. This trial is scheduled to begin December 9, 2002, with one CLEC participating. If you
are interested in becoming the trial-CLEC participant, please e-mail Change Control at Change
Control@bridge.bellsouth.com. The trial period will run for **45** days. Assuming a successful
completion of the trial, the manual process will then be made available to all CLECs until the
mechanized process can be implemented.

UNE-P-to-UNE-L **Bulk** Migration is **a** process that allows a CLEC to convert multiple user
accounts from UNE-P (loop and port) to UNE-L (loop and number portability) via submission of
one bulk project request.

Backaround: CLEC Change Control Process (CCP), change request CR0215, requested bulk
ordering capability for UNE-P to UNE-L. and was originally scheduled for Release 11.0 on
December 8 and 9, 2002. Release 11.0 is tentatively rescheduled for implementation on
December 29, 2002, excluding the UNE-P to UNE-L Bulk feature.

CR0215 for bulk ordering capability (i.e. mechanized process) for UNE-P to UNE-L is scheduled
for implementation in Release 12.0, scheduled for March 30, 2003.

Please contact your BellSouth Local Support Manager with any questions.

Sincerely.

ORIGINAL **SIGNED BY** JERRY HENDIRX

Jerry Hendrix – Assistance Vice President
Interconnection Services

ATTACHMENT  6

> From:      Change.Control@bridge.bellsouth.com [mailto:Change.Control@bridge.bellsouth.com]
> Sent:      Friday, October 18, 2002 4:43 PM
> To:  alee@epicus.com; alejandro@amexcomm.com; arnanda.hill@wcom.com;
Annette.Cook@espire.net; Annette.Hardy@accesscomm.com; Lynn.Arthur@BellSouth.com;
avincent@communitytelephone.com; bbil@4pra.com; bcarias@nightfire.com;
Becky.Gorman@accesscomm.com; bellsouth@nightfire.com; beverly.lockwood@btitele.com;
beverly.posey@centurytel.com; Bill.York@wcom.com; billg@telcordia.com;
bmurdo@KMCTELECOM.com; Bob.Buerrosse@allegiancetelecom.com; Bradbury.Jay M - LGA;
Brenda.Gant@KMCTELECOM.com; brian.feller@btitele.com; Seigler,Bernadette M (Bern) - NCAM:
bshafer@covad.com; BSNotes@talk.com; BSTCarrier@birch.com; bstewart@biztelone.com; c-
david.burley@wcom.com; c-Lorraine.Watson@wcom.com; c_and_m@bellsouth.net;
caren.schaffner@wcom.com; casenjo@IDSTELCOM.com; CAshford@birch.com;
cassandrap@networktelephone.net; Catherine.Gray@alltel.com; cbrackett@mpowercom.com;
cchiavatti@usatelecominc.com; Iacovelli,Christopher D (Chris) - ALINF; Cedric.Cox@wcom.com;
cflanigan@uslec.com; Chad.Pifer@xspedius.com; changecontrol.bellsouth@onepointcom.com;
CHaynes@nuvox.com; cheryl@eatel.com; cheryl_acosta@stratosoilandgas.com;
clarson@dset.com; cmiller@telepak.net; CoDavis@covad.com; colleen.e.sponseller@wcom.com;
Connie.Nathan@KMCTELECOM.com; craig.davis@centurytel.com; cschneider@concretio.com;
csmallwood@city.marietta.ga.us; CSoptic@birch.com; cstevens@mpowercom.com;
daddymax@netbci.com; daisy.ling@wcom.com; darrin.mcclary@centurytel.com; Kevin.Davis2
@BellSouth.com; DCooley@nuvox.com; Berger,Denise C - NCAM;
desiree@communitytelephone.com; dfeinberg@mettel.net; dfoust@deltacom.com;
dkane@aspiretelecom.com; dlawal@focal.com; DNapovanice@birch.com;
dnathanson@natelcomm.com;don@amexcomm.com; donaldsond@epb.net;
donna.poe@knology.com; dpetry@ix.netcom.com; dwilliams@nowcommunications.com;
Elliot.Wrann@dsl.net; epadfield@nextlink.com; ESingleton@eztalktelephone.com; eyu@talk.com;
Alan.Flanigan@twtelecom.com; fouts@communitytelephone.com; frankb@cellone-ms.com;
Fred.Brigham@wcom.com; Gary@CSII.net; generalg@cris.com; ggotimer@biztelone.com;
Lianne.Griffin@BellSouth.com; hcarlton@sevenbridges.net; Heather.Thompson2
@allegiancetelecom.com; Jan.Dumas@accesscomm.com; jason@basicphone.org;
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@ctmail.snet.com; jjohnson@IDSTELCOM.com; jmartin@mpowercom.com;

1

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karen.grim@mail.sprint.com; karind@covad.com; kbranch@newsouth.com; khudson@nextlink.com;
KPollard@birch.com; Timmons,King C (K.C.)- NCAM; Kyle.Kopytchak@networktelephone.net;
launch-now.notify@accenture.com; launch-now.notify@cscoe.accenture.com;
lavernek@arrowcom com; LCamillo@nwp.com; ldavidov@dset.com; leonb@psc.state.ga.us;
LHamlin@birch.com; LHOPKINS@eftia.com; LMitchell@wisor.com; LMontele@usa.capgemini.com;
lorna.richards@lecstar.com; lortega@commsouth.net; Louise.Wilds@accesscomm.com;
lynnj@nowcommunications.com> ; margaret.ring@networktelephone.net; mark@annox.com;
Mark.Ozanick@accesscomm.com; Mary.l.campbell@xo.com; mcbrunnhilde@juno.com;
MConnolly@birch.com; mconquest@itcdeltacom.com; mdossey@biztelone.com;
mer@networkwcs.com; MGimmi@nuvox.com; mhillis@telcordia.com; michael.britt@lecstar.com;
michael.dekorte@Lightyearcom.com; Micki.Jones@wcom.com; mnoshay@IDSTELCOM.com;
MpowerHelpdesk@mpowercom.com; msykes@telcordia.com; mt7210@momail.sbc.com;
MWagner@birch.com; Nancy.Welsh@espire.net; Natalie.Franklin@KMCTELECOM.com;
NDreier@birch.com; oss-accessible-letters@covad.com; > pamela.a.smith@mail.sprint.com;
PBarker@aol.com; Pkinghorn@eztalktelephone.com; pmckay@momentumbusiness.com; Cole,Peter
M (Pete) - ALINF; PPinick@birch.com; prehm@nightfire.com; PRubino@Z-TEL.com;
Quan.Nguyen@KMCTELECOM.com; Rae.Couvillion@wcom.com; rbennett@floridadigital.net;
rbreckin@telcordia.com; rbuffa@interloop.net; rcostanzo@velocityky.com;
Rdupraw@mpowercom.com; rebecca.baldwin@adelphia.com; regina.mcday@centurytel.com;
Renee.Clark@espire.net; rharsila@commsouth.net; Rick.Whisamore@wcom.com;
Rick.Williams@accesscomm.com; robert@alternativephone.com; Robert.Scordato@btitele.com;
ron.p.johnson@centurytel.com; ross.martin@xo.com; rubye@arrowcom.com;
RWilson@city.marietta.ga.us; Sandra.Hendricks@PaeTec.com; Sandra.kahl@wcom.com;
Sandrajf@intetech.com; schula.hobbs@dsl.net; SCOGBURN@newsouth.com;
scott.emener@accesscomm.com; Scott.Hibbard@wcom.com; SELEAZER@talk.com;
shane@eatel.com; shannon.smith@itchold.com; Sherry.Lichtenberg@wcom.com;
SLively@nuvox.com; smason@interloop.net; Ramesh,Sarala - ALINF; sreynolds@ernestgroup.com;
ssarem@mpowercom.com; SStapler@itcdeltacom.com; Debbie.Steen@BellSouth.com;
Steve.Brown@accesscomm.com; Steve.Moore@mail.sprint.com;
steve.sulak@nowcommunications.com; steve.taff@allegiancetelecom.com;
susan.sherfey@btitele.com; tagteam@telexcelpartners.com; tami.m.swenson@accenture.com;
taziz@epicus.com; tbarton@newsouth.com; tfry@commsouth.net; Tim@exceleron.com;
tim.koontz@networktelephone.net; Debbie.Timmons@om1.al.bst.bls.com;
Travis.Tindal@BellSouth.com; TNorvell@dcaweb.net; Todd@CSII.net; Todd_Sorice@icgcomm.com;
tom.hyde@Cbeyond.net; tonyam@communitytelephone.com; Trudi.Seidl@GlobalCrossing.com;
ts1336@sbc.com; TWimmerstedt@city.marietta.ga.us; Tyra.Hush@wcom.com;
usfloridaoss@kpmg.com; Walter.Carnes@accesscomm.com; wendy.hernandez@comporium.com;
WFletcher@birch.com; wolfsbrg@cris.com; Yvette,Brown@espire.net; jake.hayes@newsouth.com
> Subject:     ID: RE: BST Response to Release 13.0 Concerns
>
> > <<SEND>> > > <<RE: BST Response to Release 13.0 Concerns>> > > <<R13_1018.DOC>>

Bernadette,

Please see the attached BST response regarding your 10/10/02 email

Let us know if you have questions.

Thanks,

Change Management Team

_____ Distributed Message _____

Message sent by: Change Control /m6,mail6a

To unsubscribe from CCP, send a message to
list.manager@bridge.bellsouth.com with the Subject line: UNSUBSCRIBE CCP

For online help, send a message with the subject HELP.

October 18, 2002


Bernadette,

This is in response to your 10/10/02 email regarding the BST Prioritization Ranking document   **A** summary of AT&T's questions and the BST responses are listed below

1   When will the following 5 CLEC Initiated CRs that are currently not scheduled be scheduled for a release   CR0284, CR0135, CR0104, CR0676, CR0926

*BST Response*  These features will be scheduled in the next available CLEC Production release   The 2003 releases are at capacity; therefore, once the schedule for 2004 is defined, we will begin reviewing the list of priorities to determine when these features can be scheduled  Should any capacity become available in 2003, BellSouth will evaluate the possibility of slotting these features within that available capacity.

2. What is SGG? Need BST to disclose capacity units for SGG per release.

*BST Response*   ServiceGate is a flexible and scaleable gateway that supports a variety of business needs, some of which include a gateway, validations and router. Many of these are contained in modular components within ServiceGate.   SGG interacts with user interfaces such as EDI, LENS and TAG.    SGG is listed on Appendix H-Preliminary Feature Sizing Model for CCP Prioritization Planning and was incorporated into the Change Control Process Guide earlier this year.  When the preliminary sizing models were provided to the CLEC Community for the 5-22-02 Prioritization Meeting, SGG estimates were included for each change request.

SGG is one of the applications under the OSS-2 SQM and is subject to tier 2 penalties. Previously, the SGG application was referred to as COG in the SQM documents.

**As** communicated previously, BellSouth cannot provide the capacity units for SGG per release. The sizing for each application and phase per release is dependent on many other factors, some of which include timeframe for the release and impact of features, timeframe. etc. of other releases and is not a constant number.

3.  When will sizing be shared for CR0135 (Merging of Accounts) and CR scheduled by BST?

*BST Response*   It is BellSouth's plan to provide preliminary sizing for CR0135 for the 12/11/02 scheduled prioritization meeting,  CR0135 is being worked at OBF and is currently in initial closure status   It is expected that this issue will reach final closure at OBF in November

4    Why did BST put CR0221 (Ability to populate LQTY when requesting a Partial Pre-Order Query for Due Date Estimate) out for 9/25/02 Prioritization if it was delivered 8/24/02?

*BST Response:*  After the 9/25/02 Prioritization Meeting, the Change Management Team learned that CR0221 was implemented with CR0029 (Partial Migration of UNE Loops) on 8/24/02-8/25/02 (Release 10 6).  The functionality outlined in CR0221 was inherent to the functionality provided with CR0029  Change Request CR0221 was not immediately identified with Release 10.6 since the functionality was built-in with Partial Migration of UNE Loops.  BellSouth apologizes for any inconvenience in this matter.

5.  Explain when CR01 13 (LENS Inquiry-View Customer Record – Use 3-digit customer code in validation logic) was implemented and why were CLECs only told in October

*BST Response*   After the 9/25/02 Prioritization Meeting, the Change Management Team learned that CR0113 was implemented in early 2002 with a CRIS contract change.  This CFUS contract change allowed LENS to return the customer code on the CSR.  This was a backend system change, not an Encore release change.  BellSouth apologizes for any inconvenience in this matter.


Please let us know if you have questions

Thanks.

Change Management Team

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington D.C. **20554**

| | |
|---|---|
| **In** the Matter **of** )<br><br>Application **of** BellSouth Corporation, )<br>Pursuant to Section **271 of** the )<br>Telecommunications Act **of 1996,** to )<br>Provide In-Region, InterLATA Services in )<br>the States **of** Florida **and** Tennessee )<br><br>) | **WC** Docket **No. 02-307** |

SUPPLEMENTAL DECLARATION **OF** DENISE BERGER

I.      My name is Denise Berger.  I am the same Denise Berger who tiled a declaration

on October 10, 2002 and a reply declaration on November 1, 2002 in this proceeding

2.      My testimony discusses a continuing problem with service disruptions on UNE-P

migration orders that BellSouth was supposed to have resolved earlier this year and,

indeed, was ordered to resolve by the Georgia Public Service Commission and Louisiana

Public Service Commission.  The problem is the continuing use of two orders for partial

migrations of service that BellSouth had committed to resolve by introduction of the

single "C" order to replace the use of two separate orders that caused customer outages

Notwithstanding BellSouth's claims to this Commission, the Georgia and Louisiana

commissions, and the CLEC community that the single "C" order would resolve the

problem, it is now clear that service disruptions are still occurring.  **As** BellSouth is now

disclosing *for the first time,* the single "C" order has been implemented **only** for full

migrations of service to replace its previous process using separate disconnect ("D") and

new ("N") orders. BellSouth is continuing to use two separate orders for partial

migrations, a new ("N") order to establish the end-user as a CLEC customer on UNE-P

and a change ("C") order to disconnect the customer in the BellSouth systems

BellSouth's failure to address this problem completely causes competitive injury to

CLECs and is emblematic of BellSouth's failure to devote the resources to OSS to

resolve provisioning problems   The result, as usual, is that CLECs bear the

inconvenience, expense, and customer disruptions that result from BellSouth's failure to

address shortcomings in its systems and OSS and its failure to clearly and

straightforwardly communicate plans for implementation of solutions to both CLECs and

regulatory commissions.

I.    **BellSouth's Commitment to the Single "C" Order to Resolve Service Disruptions Associated with Use of Separate "D" and "N" Orders to Process UNE-P Conversions.**

*3.*    In the Georgia/Louisiana proceeding, AT&T and other CLECs identified

BellSouth's failure to provision **UNE-P** migrations correctly as the reason for significant

customer outages and loss of service.  The reason for the outages was BellSouth's use of

separate "D" orders and "N" orders to provision a migration order.  If BellSouth did not

relate the orders and/or process them in the proper sequence, the customer's service was

disconnected pursuant to the "D" order before the "N" order conversion was completed.

In addition, a customer who canceled his order would be converted to CLEC service

anyway because the "N" order might be worked prior to BellSouth's processing of the

supplement canceling the order

**4**    AT&T documented these problems in the Declaration of Bernadette Seigler, dated

October 19, 2001 in Docket 01-277 (Ga/La I), and the Supplemental Declaration of

Bernadette Seigler, dated March **4,** 2002 in Docket **02-35** (Ga/La II) and urged the

adoption of a single "C" order to eliminate the customer outage problems associated with use of two separate orders The Seigler declarations included examples of customers (with associated PON numbers) who had experienced outages during their service migration or suffered a decline in call quality as a result of BellSouth's provisioning the order on different (and probably older) facilities. These comments made no distinction between problems with full migrations and problems with partial migrations of service *See* Seigler Ga/La I Declaration, ¶¶ 17, 38-50, Seigler Ga/La II Declaration, ¶¶ 9-16.

5      In response to the service outages associated with the two order process, both the Georgia Public Service Commission and the Louisiana Public Service Commission ordered BellSouth to implement a single "C" order to eliminate the service outage and service degradation problems.[1] BellSouth wrote the Georgia Commission that it could not complete the implementation of the single "C" order by the January 5, 2002, deadline established by the Georgia Commission but would implement the change in March 2002. At no time did BellSouth distinguish between full and partial migrations in its written communications with the Georgia or Louisiana Commissions that are publicly available

6      In the *Georgia/Louisiana 271* **Order,** the Commission stated that it was "confident that this issue is resolved" by introduction of the single "C" order and noted its expectation that "BellSouth will take the necessary steps to cure any problem associated with implementation of single 'C' ordering." *Georgia/Louisiana 271* **Order** at ¶ 167

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[1] The Georgia Commission ordered BellSouth to implement the single "C" order by January 5, 2002 *See* Comments of Georgia Public Service Commission, CC Docket No. 02-35, Georgia/Louisiana 271, at 20-21  The Georgia Commission included a fine of 610,000 per day for BellSouth's failure to comply with the order. The Louisiana Public Service Cornmission ordered BellSouth to implement the single "C" order by April 2002.  Docket No. U-22252, Subdocket E, In re Consideration and review of BellSouth Telecommunications, Inc.'s preapplication compliance with Section 271 of the Telecommunications Act of 1996, Order No U-22252(E) (Sept. 21, 2001).

7.      BellSouth stated that it implemented the single "C" order in Florida, Georgia.

Mississippi, and Louisiana on March 24, 2002. In a Carrier Notification SN91083167

dated lune 19, 2002, (attached hereto as Attachment 1) entitled "CLECs --

Implementation of Conversion to Unbundled Network Element (UNE) - Port/Loop

Combination via a Single "C" Order," BellSouth indicated that it was implementing the

single "C" order on July 21, 2002, in Alabama and South Carolina and on August 4, 2002

in North Carolina, Kentucky, and Tennessee   BellSouth's notification made clear that the

single "C" order was being applied to UNE-Port/Loop combination conversions:

> With the implementation of this functionality, requests
> submitted for UNE - Port/Loop Combination conversions
> will be processed via a single "C" type order   Currently,
> those requests for accounts in [Alabama, South Carolina,
> North Carolina, Kentucky, and Tennessee] are processed
> via the issuance of a Disconnect ("D") and a New Connect
> ("N") order.

II.      BellSouth **Uses** the Single **"C" Order** Only on Full Migrations **But Uses Two**
        Separate **Orders** on Partial Migrations That Cause Customer Outages.

8       BellSouth's Carrier Notification was wrong.  BellSouth uses the single "C" order

only on full migrations of service, and as AT&T has learned as a result of a customer's

loss of service, for partial migrations, BellSouth continues to use two separate orders to

disconnect and connect a customer's service   AT&T and other CLECs were never told in

*any* meeting, *any* announcement (including the Carrier Notification discussed above), or

indeed in *any* written communication that the single "C" order would be used only for

full migrations and that partial migrations, a significant portion of small and medium

sized business orders, would continue to be subject to service disruptions as a result of

the use of two separate orders

9.     AT&T learned about the problem as a result of an Alabama customer's loss of

service after a partial migration of service. In October, 2002, AT&T submitted a local

service request ("LSR") to migrate a portion of a customer's service to AT&T using the

UNE-P platform   **As** AT&T has subsequently learned in investigating this issue, in

response to AT&T's LSR, BellSouth issued a new ("N") order to establish the new AT&T

service and a change ("C") order to disconnect the associated service in the BellSouth

systems on or about October 16, 2002  BellSouth assigned a due date of October **17,**

2002, to the "N" order to establish the AT&T service and a due date of October **25,** 2002

for the "C" order. The BellSouth service representative subsequently discovered that the

"C" order and "N" orders were not properly related and sought to relate the two orders.

As was the case with the use of the separate "D" and "N" orders, if the two orders are not

related properly, the new service with AT&T would be established by the first order, but

then subsequently disconnected by the second order. The BellSouth agent apparently

attempted to relate the orders by calling **up** the "C" order and attempting to relate that

order to the "N" order. This attempt apparently produced an error message.  The service

representative then enlisted a second BellSouth service representative to override the

error  At this point, the BellSouth representative believed that the problem had been

resolved and that the service would be implemented appropriately.  Unfortunately, this

representative's actions assured that the customer would lose service.[2]   Because the

proper procedure was not followed, a "ghost image" of the original "C" order still existed

in the BellSouth system with a due date of October 25, 2002  On October 17, 2002,

BellSouth processed the "N" order, and the customer was migrated to AT&T UNE-P

---

[2] Apparently, the BellSouth representative should have canceled the order in its entirety and recreated the
order with the correct relationship between the "N" order and the "C" order

service   On October 25, 2002, however, BellSouth processed the ghost image of the

original "C" order as directed by the BellSouth system and proceeded to disconnect the

migrated customer lines

10      AT&T has discussed this issue with BellSouth and understands that BellSouth is

implementing remedial training for the BellSouth representative and additional training

for all BellSouth representatives

11.      The more significant issue, however, is the existence of the problem in the first

place   BellSouth stated *in* various meetings with CLECs and with state regulators that

the single "C" order would resolve problems with UNE-P migrations   **As** an example,

the UNE-P Users Group Meeting Minutes for December *6,* 2001, prepared by BellSouth,

recount the "High-Level Single C-Order Overview" provided by BellSouth in which it

described the implementation of the Single "C" Order but gave no indication that it

related only *to* full, but not partial, migrations:

> Single C is an effort within BellSouth to process the request
> to convert an account to UNE-P via the issuance of a single
> change order.  Currently, a new (N) order and a disconnect
> (D) order are required.  Conversion scenarios will include
> Resale to UNE-P (same or different CLEC), Retail to UNE-
> P (BellSouth to CLEC), and UNE-P to UNE-P (CLEC to
> CLEC)   The account types planned are residence and non-
> complex business.  This will eliminate the need for two
> SOCS orders and the associated coordination. There will
> be no change in LSR inputs or processing by CLECs.
> However. BellSouth's internal ordering/billing process will
> change.  Single C will be both manual and mechanized.
> The  targeted implementation date is second quarter of
> 2002.'

---

[3] UNE-P User **Group** Meeting Minutes 12/06/01 at 5 (attached as Attachment 5 to Seigler Ga/La II **Supp** Declaration)

12      Having been informed by BellSouth that implementation of the single "C" order

would resolve all problems with service outages resulting from use of separate orders

AT&T and other CLECs are now being told by BellSouth that the "N" and "D' orders

related only to full migrations and that BellSouth uses "N" and "C" orders to provision

partial migration orders and that partial migrations have not been included in the changes

made to BellSouth's systems.  When this issue was raised with BellSouth, BellSouth

responded that the full migration and partial migration orders were completely separate

and acted as if they were not both part of the UNE-P customer migration process:

> BellSouth's intent in addressing the **UNE-P** customer
> outage problem focused on the new (N) and disconnect (D)
> order process.  Therefore, discussions centered around
> single C as a solution for outages caused by the N and D
> order process.  At BellSouth, the N and D order process
> applied to full migrations only.  The ordering process for
> partial migrations which is New and Change (C) orders
> remains the same.  Perhaps incorrect assumptions were
> made by BellSouth and the CLECs regarding what was
> being communicated with respect to full and or partial
> migrations being impacted by the single C solution.[4]

13.     After spending more than a year seeking to resolve a serious customer-affecting

problem, AT&T and other CLECs have now learned, through yet another customer

outage, that the problem has only been partially addressed, let alone resolved   BellSouth

never informed *anyone* that its proposed change affected only some, but not all, UNE-P

conversion orders.  The problems of customer outages affected both full migrations and

partial migrations, and the single "C" order solution -- as stated by BellSouth in repeated

statements to CLECs, this Commission and state regulators -- was designed to eliminate

the problem *in its entirety.*  Through either deliberate indifference or conscious neglect.

BellSouth has misled the entire CLEC community, this Commission, and state regulators

in Georgia, Louisiana, and elsewhere, in implementing a half-baked response to a real problem that causes real competitive injury to CLECs. This is further evidence that BellSouth has little interest in CLEC concerns or devoting the resources to the change control process to address CLEC issues

14.     Further, BellSouth's proposed solution to this matter is unacceptable   BellSouth proposes that CLECs should take up the problem of use of separate orders for partial migrations in the change control process   **As** documented in AT&T's comments filed in this proceeding, that means the problem will not be resolved until 2004, and CLECs will have to prioritize this request and use some of their 50% of the change capacity to implement a solution that should have been completed several months ago. During the couple years that it takes BellSouth to resolve this provisioning problem, BellSouth will continue to put partial migration customers out of service using two orders after committing last year to change that process.

15.     Clearly, BellSouth has not "take[n] the necessary steps to cure any problem associated with implementation of single 'C' ordering," and equally clearly, this problem is by no means "resolved."

---

[4] Email from Janet M  Fields, BellSouth, lo Denise Berger (Nov  **8, 2002**)

## VERIFICATION

I declare under penalty of perjury that the facts stated herein are true and correct, to the best of my knowledge, information and belief.

                                          /s/ Denise Berger
                                          Denise Berger

Date. November 13. 2002

BellSouth Interconnection Services
675 West Peachtree Street
Atlanta, Georgia 30375

Carrier Notification
**SN91083167**

Date.          June 19, 2002

To:            Competitive Local Exchange Carriers (CLECs)

Subject.       CLECs - Implementation of Conversion to Unbundled Network Elements (UNE) -
               Port/Loop Combination via a Single " C Order

This is to advise that BellSouth will implement Single "C" functionality in the remaining BellSouth
states on the following schedule:

        July 21, 2002

            Alabama
            South Carolina

        August 4, 2002

            North Carolina
            Kentucky
            Tennessee

With the implementation of this functionality, requests submitted for UNE – Port/Loop
Combination conversions will be processed via a single "C" type order. Currently, those
requests for accounts in the above-listed states are processed via the issuance of a Disconnect
("D") and a **New** Connect ("N") order.

This functionality was implemented in Florida, Georgia, Mississippi and Louisiana on March 24.
2002.

Please contact your BellSouth Local Support Manager with any questions.

Sincerely,

ORIGINAL SIGNED BY **JIM BRINKLEY**

Jim Brinkley – Senior Director
BellSouth Interconnection Services

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